

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

WAG ACQUISITION, L.L.C.,

Plaintiff,

v.

BERONATA SERVICES LTD. et al.,

Defendants.

No. 2:25-cv-00162-JRG

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION TO EXTEND DEADLINE  
TO JOIN ADDITIONAL PARTIES**

Plaintiff WAG Acquisition, L.L.C. (“WAG”) respectfully requests that the Court extend the deadline to join additional parties by two months, from July 23, 2025 to September 23, 2025. Defendants Beronata Services Ltd. and BNC Technology and Advertising Ltd., (d/b/a “bongacams.com,” “Bonga Cams,” and “BongaCams”) (collectively, “Defendants”) do not oppose this Motion.<sup>1</sup> In support of this Motion, WAG states as follows:

1. The initial Scheduling Order in this case was entered on June 27, 2025 (Dkt. No. 8). WAG served its infringement contentions and disclosures pursuant to P.R. 3-1 and 3-2 on July 2, 2025, and the Scheduling Conference was held on July 16, 2025.
2. Pursuant to the initial Scheduling Order, the deadline to join additional parties is currently July 23, 2025, one week after the scheduling conference.

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<sup>1</sup> Defendant Proweb Progressive Development Ltd. is in the process of being served via the Hauge Convention and has not yet appeared.

3. Based upon the limited discovery the Parties have exchanged to date, WAG believes there may be additional parties that should be joined in this lawsuit. WAG requires additional time to conduct discovery to ascertain the identity of these parties.

4. This Motion is timely and was filed prior to the deadline for joining additional parties. The case is still in very early stages, and this extension is not sought for the purpose of delay, but for good cause to ensure that the correct parties are properly joined to this action. Thus, a two-month extension of time to join additional parties at this early stage will not prejudice the parties and should not affect any other dates on the schedule.

5. Counsel for WAG informed counsel for Defendants of this Motion and the relief sought herein. Counsel for Defendants indicated that they do not oppose the Motion.

Accordingly, WAG moves the Court to extend the deadline to join additional parties to September 23, 2025. A proposed order accompanies this Motion.

Date: July 21, 2025

Respectfully submitted,

By: /s/ Wasif H. Qureshi  
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**COUNSEL FOR WAG ACQUISITION,  
L.L.C.**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 21, 2025, I electronically filed the foregoing and accompanying documents with the clerk of the court for the U.S. District Court, Eastern District of Texas, using the Court's electronic case filing system, and thus the foregoing and accompanying documents have been electronically served on counsel of record.

By: /s/ Wasif H. Qureshi  
Wasif H. Qureshi

**CERTIFICATE OF CONFERENCE**

Counsel for WAG informed counsel for Defendants of this Motion and the relief sought herein. Counsel for Defendants indicated that they do not oppose the Motion.

By: /s/ Wasif H. Qureshi  
Wasif H. Qureshi